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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

Willy Harpo
v.

INTERMARK MANAGEMENT
CORPORATION, et al.

Civil Action No.

1:21-LV-087

PLAINTIFF'S NOTICE OF CORRESPONDENCE
WITH OPPOSING COUNSEL TO FACILITATE
DISCOVERY COOPERATION

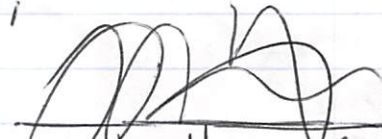
NOW COMES the Plaintiff, pro se, Willy Harpo, in the above-styled case, pursuant to F.R.Cv.P. 26, et seq. to 36, to give notice to this Court of Plaintiff's efforts to correspond with opposing counsel in order to facilitate cooperation with discovery, and shows the following:

- (1) Attached hereto and incorporated herein by this reference is a true and correct original draft of a letter written to opposing counsel, which copy thereof was sent to such attorney on Friday, April 21, 2023 concerning discovery topics and requests in an attempt to elicit a response hereto afforded, shown as exhibit A. (Exhibit A - attached hereto and incorporated herein by reference).

(1.2)

(1.3)

Respectfully Submitted and Filed,
This 21st day of April 2023.


Xfinity Harpo (23619509)
F.L.C. Coleman Low
Coleman Low
P.O. Box 1031
Coleman, Ga. 33521


* CERTIFICATE OF SERVICE *

I - Xfinity Harpo - hereby certify and declare, under penalty of perjury, pursuant to 28 U.S.C. § 1746 and the laws of the United States, that I have duly sent the above and within document and exhibit to the following recipients by depositing the same in the U.S. Postal Service regular first class prison mailbox, with sufficient amount of prepaid postage affixed to secured packaging, properly and correctly addressed to:

(1) Sean L. Hynes c/o Jill Downey-Morris
DOWNEY & CLEVELAND, LLP
288 Washington Ave
Marietta, Ga. 30060

(2) Clerk of Court - U.S. District Court
Southern District of Ga. - Augusta Division
600 James Brown Blvd.

Augusta, Ga. 30903.

This 21st day of April 2023.  Xfinity Harpo (2.5)

(2.2)

Vivian Harpo
23619 - 509
Federal Correctional Complex
Coleman Low
P.O. Box 1031
Coleman, Florida 33521

April 21, 2023

Sean L. Hynes
DOY/NEX & CLEVELAND, L.L.P.
288 Washington Avenue,
Marietta, Georgia 30060

RE: Notice of Postponement of Deposition of
Defendant Mario Markyna (1:21-CV-087)

Greetings, Counsel (Alleged):

Pursuant to the recent notice your office received regarding the deposition of Mario Markyna in pending federal action 1:21-CV-087 scheduled for Friday, April 28, 2023, the same has presently been postponed pending availability of the reporter assigned to record the event. Also, an order per the Plaintiff's request for an extension of time to conduct such deposition is pending before the Court and is expected to be ruled upon soon.

Meanwhile, as such deposition shall be had

(Exhibit A - Notice of Correspondence)

(3.5)

(1.3)

upon interrogatories to the deponent which were previously delivered to your office (in October, November, and December, respectively) without a reply or response submitted as yet, the deposition may possibly be avoided upon provision of proper responses from your alleged client Markyna.

Additionally, as I have attempted, in vain, to communicate with you concerning discovery-related topics (including scheduling depositions) over the past several months, both, directly and via a liaison/assistant, please advise of a date and time that may be most convenient for you and Markyna to participate in the deposition so that I may attempt to so accommodate your agenda accordingly.

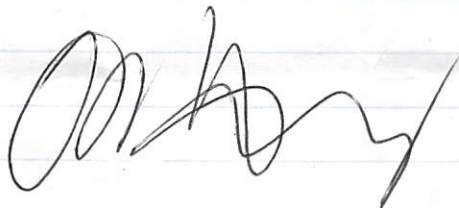
Further, please be advised that my duly selected liaison(s) is/are not attempting to portray the role of an attorney in the attempts to gather or relay information from or to your office in the process of coordinating the conduct of such deposition. Neither will said liaison be actually conducting the deposition on my behalf in lieu of myself or a licensed attorney. Therefore, your future cooperation is requested as helpful for this end.

If you have any questions or issues concerning this matter or any other, please convey them directly to me in writing.

Additionally, please advise me of where I may find a copy of, or other proof, of your request to proceed pro hac vice in the Southern District of Georgia - Augusta Division - per cases 1:20 - cv - 176 and 1:21 - cv - 087, as well any corresponding court order granting the same. Also, please identify your local sponsoring attorney(s) in the Augusta Division per such pro hac vice practice/appearance.

Thanks, in advance, for your attention and cooperation in these matters. Please respond accordingly. My liaison will email this notice as well.

Most Respectfully,



V. J. Harpo,
Plaintiff, pro se.

cc: File

Windy Harpo
23619509
Federal Correctional Complex
Coleman Low
P.O. Box 1031
Coleman, Fla. 33521

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SAINT PETERSBURG FL
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April 26



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Office of the Clerk
United States District Court
Southern District of Georgia
Augusta Division
606 James Brown Boulevard
Augusta, Georgia 30903

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